



STATE OF IOWA

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DEPARTMENT OF EDUCATION
JUDY A. JEFFREY, DIRECTOR

Date: September 1, 2005

To: Independent Child Care Centers and Center Sponsors

From: Robin Searles, MS, RD, Consultant
Bureau of Nutrition Programs and School Transportation

Re: Change Regarding Infant Feeding in the CACFP

This memo provides notice of a change regarding infant feeding requirements for centers that participate in the Child and Adult Care Food Program (CACFP). A summary of all requirements is also included. This memo supercedes a memo issued on January 21, 2005 (CS-2005-5 & IC-2005-2) entitled "Infant Feeding in the CACFP." Most requirements are the same and changes are clearly identified. This memo and all forms referenced are on our website at:

<http://www.state.ia.us/educate/ecese/fn/cacfp/infant.html>.

1. **Changes:**

The 2nd Interim Rule published by the United States Department of Agriculture (USDA), Food and Nutrition Service (FNS) entitled, "Child and Adult Care Food Program: Improving Management and Program Integrity" (69 FR 53501) requires State agencies to monitor institutions' compliance with Program regulations and with any applicable instructions and guidance issued by USDA. The interim rule clarifies that guidance issued by FNS is binding, and must be implemented by State Agencies and Program participants. In previous memos **several practices from USDA guidance had been listed as recommendations that are now considered requirements.**

Now Required Practices for Feeding Infants:

- a. Implement the practices for infant care presented in the manual: "Feeding Infants: A Guide for use in the Child Nutrition Programs". Your center should have a copy on hand. If you do not have a copy, or need additional copies for center sites or individual employees, it may be downloaded from the USDA website at:
http://www.fns.usda.gov/tn/Resources/feeding_infants.html or requested from our Bureau.
- b. Emphasize good communication with families of infants. You may use the infant section of the enrollment form, the infant foods tried at home form and meal patterns to assist you.
- c. Allow parents or guardians to introduce new foods when the infant first starts solid foods. Parents should communicate what foods have been introduced in writing to the center. Suggested form: infant foods tried at home.
- d. Do not feed an infant solid foods until the infant is developmentally ready according to the information on pages 11, 12, 13 of "Feeding Infants: A Guide for use in the Child Nutrition Programs."
- e. Support and encourage families who choose breastfeeding for their infant. Provide a quiet place for mothers to breastfeed their babies. You may request a packet, from our Bureau

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entitled, "Breastfed Babies Welcome Here" that includes a poster, child care provider's guide and a mother's guide.

- f. USDA indicates that the formula an infant receives be the formula chosen by the parents in consultation with their physician. The caregiver should not make this decision about the type of formula fed.
- g. A few questions and answers issued with the January 2005 memo have been revised. A revised set of all questions and answers is available on our website. The main change is Q&A 14 regarding the need to sterilize water. **USDA's Feeding Infants, A Guide for Use in the Child Nutrition Programs, 2002**, page 25 states:
 - Water should be from "a source approved by the local health department,"
 - If the safety of the source is in doubt, ask the local health department to test the water, and if the water is not safe, the health department should recommend a safe source,
 - If tap water is used, use only cold water that has run for 2 minutes (to reduce lead from pipes).
 - Sterilize all water, regardless of the source, by boiling for 1 to 2 minutes, and allowing it to cool (the only exception is to purchase "sterilized water"). Do not boil water over 5 minutes or lead and nitrates may be concentrated.
 - Additional State *recommendations* are provided in the online Q&A's.

The Reimbursable Foods for Infants list has been updated.

The new list is posted on our website at <http://www.state.ia.us/educate/ecese/fn/cacfp/infant.html>.

2. Requirements to Claim Infant Meals:

- a. Follow infant meal patterns unless you have a physician's statement for exceptions.
- b. Feed infants "reimbursable" foods (list of reimbursable and non-reimbursable infant foods is available on our website).
- c. Offer parents of all infants the option of at least one center-supplied, reimbursable infant formula. In order to document that you have fulfilled this requirement, parents must complete the infant enrollment form indicating their choice to accept or to decline the formula and foods the center supplies. This form must be kept on file at the center. We recommend that you choose to offer a formula that is commonly used by several infants in your care.
- d. Document foods served to each infant daily. Infant meals cannot be claimed without a daily dated menu for all meals served to each infant that are submitted for reimbursement.

DHS already requires that the center record and keep on file an individual daily written record of the amount of food consumed and the times at which the infant has eaten. Because this record is already required, we recommend that this be used as documentation for infant menus. Enough detail needs to be recorded to identify that reimbursable foods were used and that meal pattern requirements were met. For example, iron-fortified infant formula (IFF) should be recorded rather than "formula" and iron-fortified infant cereal (IFC) should be recorded rather than "cereal". The specific type of food should also be recorded (e.g., IFIC-rice, grape juice, etc.).

Another option for recording infant meals is an *individual infant menu*. A monthly form may also be used. In the past, we have provided a *group infant menu* form that lists a weekly menu for all children within an age group. While this form may still be used, it is not optimal for all infants since infants develop at different rates and their care should be individualized

according to wishes of the parents (within the structure of DHS licensing rules and the requirements of the CACFP). This form is acceptable when you have infants of the same age group that are consuming the same foods (usually 0-3 month olds and 8-11 month olds).

Examples of all infant menu forms that may be used are available on our website at: <http://www.state.ia.us/educate/ecese/fn/>. Each example has advantages and disadvantages for infants at different ages/stages of eating.

- e. Record infant meal participation at the point of or shortly after meal service. It is recommended that the meal participation record be kept on a clipboard in an accessible location in the infant room.
- f. All meals served by center staff to infants age birth through 7 months are reimbursable even if the parent supplies the breast milk or formula, when breast milk or formula is the only food served.
 - If the mother comes to the care setting to breastfeed her infant, and no other food is supplied by the center, the meal may not be claimed.
 - If center employees breastfeed their own enrolled infants at the center, these meals may be claimed.
- g. When the parent/guardian of infants age 4 through 7 months indicate the infant is ready to have solid food, the center must supply at least one reimbursable item (formula or optional food listed in the meal pattern) at breakfast, lunch, and supper in order to claim the meal.
- h. For infants 8 through 11 months, the center must serve all foods listed in the infant meal pattern and supply at least one reimbursable item (food or formula) in order to claim the meal.
- i. All infants must be enrolled for care at the center.
- j. Infants claimed must be recorded in daily attendance.

Only meals that meet requirements (a.-j. above) may be claimed for CACFP reimbursement.

3. Additional Requirements:

- a. All staff members who have a role in purchasing, preparing, serving and recording infant meals, must receive training. This training may be conducted by our office or by a center staff person knowledgeable about infant feeding requirements. All training should be documented with the topics covered, names of participants, date, start and end times, location and name of presenter.
- b. Infant caregivers should be supervised on an ongoing basis to assure that CACFP requirements are met.
- c. Staff involved in preparing the claim that includes infant meals must be trained to ensure that only reimbursable meals are submitted for reimbursement.
- d. A maximum of 3 meals per infant per day, if served, may be claimed for reimbursement. This may include 2 meals and a snack, or 2 snacks and a meal.

Please contact our office or your local CACFP consultant if you need further clarification or have questions about feeding or claiming infants in the CACFP.